

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 1:19-CR-0696 (PAE)
)
ARI TEMAN,)
)
Defendant.)

DECLARATION OF EDEN P. QUANTON IN SUPPORT OF
MOTION NON-REPORTING SUPERVISION

I, Eden P. Quainton, declare under penalty of perjury that the following is true and correct:

1. I have acted as counsel for Defendant Ari Teman (“Defendant” or “Mr. Teman”) in a number of matters, including several before this Court. The scope of my engagement with Mr. Teman did not cover Defendant’s most recent motion, Dkt. 471, and I was unavailable because of the illness of my wife to discuss the matter with Mr. Teman before the motion was filed. I understand Mr. Teman was concerned that the motion be filed promptly to give the Government and the Court adequate time to consider his request.

2. I submit this declaration in support of Mr. Teman’s motion, which I believe is meritorious and reasonable under the circumstances.

3. First, I have spoken to Mr. Teman’s probation officer, Mr. Jimmy Wong, in the past and he has confirmed to me orally and in writing that he does not oppose Mr. Teman moving to non-reporting supervision in Israel, subject to Mr. Teman’s obligation to report to probation upon his return to the U.S.

4. Set forth as Exhibit A hereto is a true and accurate copy of my correspondence on this topic with Officer Wong.

5. Second, the escalating violence with the Houthi rebels in Yemen makes travel to and from Israel increasingly risky. As the AP reported just a few days ago, noting that although the ongoing wars Hamas and Hezbollah appear to have calmed somewhat, the conflict with the Houthi rebels has gained in intensity:

But the Houthis persist. In recent weeks, missiles and drones from Yemen have struck nearly every day, including early Friday morning, setting off air raid sirens in broad swaths of Israel. In some cases, the projectiles have penetrated Israel's sophisticated aerial defense system, most recently toppling an empty school and shattering the windows of apartments near an empty playground where one missile landed.

<https://apnews.com/article/israel-houthis-yemen-gaza-war-1435d3ac2f16e2faed608fdb5a100e71>

6. The AP also noted that air travel to Israel has suffered because of these attacks:

[T] rocket fire is posing a threat to Israel's economy, keeping many foreign airlines away and preventing the country from jump-starting its hard-hit tourism industry.

Id.

7. As a result of the multifaceted attacks against Israel and its infrastructure, including the Ben Gurion international airport, it is difficult for Mr. Teman to leave Israel. Even more concerning, the ongoing wars will make it difficult for Mr. Teman to return to Israel to visit his parents. As your Honor knows, Mr. Teman's mother suffers from serious medical issues and benefits enormously from the presence of her son for support and comfort.

8. Third, Mr. Teman has paid restitution in full and there is no need for reporting supervision to ensure compliance with any financial obligations.

9. Fourth, the preventive and rehabilitative goals of post-release supervision are more than adequately met if Mr. Teman remains in Israel. Mr. Teman's presence in Israel as opposed to Florida creates no danger for US purposes, and your Honor has in any event found that Mr. Teman is not a danger to the community. *See* Dkt. 425. Moreover, as Mr. Teman has indicated in his submissions, he is active in non-profit work in Israel, and is well-integrated into social life for family, cultural and religious reasons.

10. Fifth, if the Court has any concern about Mr. Teman in Israel, he could be ordered to report to his probation officer periodically by Zoom. During the Covid pandemic, courts around New York permitted contact with probation officers to occur remotely. *See* <https://www.exitprobationparole.org/covid-19-response#New%20York>. Here, Mr. Teman could also report to his probation officer *via* Zoom or some other remote platform if needed.

11. For all these reasons, I write to support a modification of Mr. Teman's post-release conditions to permit him to remain in Israel on non-reporting supervision status, as modified by remote reporting to the extent the Court deems necessary.

Dated: January 7, 2025
New York, NY

Eden P. Quainton
EDEN P. QUAINTON